



CENTER PARCS - MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

We recognise our moral and legal responsibility in relation to modern slavery and human trafficking and we are committed to ensuring that there is no modern slavery, human trafficking or unlawful child labour in any part of our business or supply chain.

COVID-19 Impact

The impact of COVID-19 on our business has been severe due to the closure of our Villages, in accordance with government restrictions, for varying periods throughout the year,.

Our primary objective throughout this period has been to protect the physical and mental well-being of our guests and employees by taking necessary steps to ensure that all applicable health and safety guidance is implemented. However, this has meant that we have not introduced any new initiatives relating to modern slavery and human trafficking. Our existing policies, procedures and practices remained in place and are described below. We will review and update our initiatives during the coming year.

The Center Parcs Business

Center Parcs is a leading UK and Irish short-break holiday business. We operate five holiday villages in the United Kingdom and one in Ireland. The Center Parcs group has approximately 9,500 employees in the UK and Ireland.

Our supply chain includes the procurement of goods and services necessary for the operation of the holiday villages and is made up of; goods for re-sale, food and beverage, business and consultancy services, consumables and disposables, and construction and property.

This statement sets out the steps we have taken and intend to take to prevent modern slavery and human trafficking in our business and supply chain.

Modern Slavery Framework

Our modern slavery framework of policies and processes include the:

- **Code of Business Conduct and Ethics** which makes it clear that we conduct our business to the highest ethical, professional and legal standards and expect all our employees and those acting on our behalf to do the same. Any breach of the Code could result in disciplinary action and dismissal. All relevant employees undertake annual training and certify their compliance with this Code;
- **Ethical Trading Policy** which aims to embed ethical standards into our business and ensure that modern slavery and human trafficking is not taking place anywhere in our supply chain. In addition, we aim to work with UK and international suppliers who treat their obligations towards modern slavery and human trafficking with the same importance that we do;
- **Whistleblowing Policy** which encourages anyone to report any concerns about employment conditions, modern slavery or wider issues. An independent external Whistleblowing Hotline is available so that disclosures can be made without fear of retaliation. This service is available to all employees, temporary workers and agency staff, as well external contractors and consultants. Calls to the confidential hotline are monitored and escalated as appropriate if further action is required. To date we have not received any calls related to modern slavery issues;

- **Anti-Bribery and Corruption Policy** which outlines our zero tolerance of fraud or bribery. This policy applies to all employees, temporary workers and agency staff and third parties acting on our behalf, as well as all suppliers. Our suppliers are required to agree to the Ethical Trading Policy, which includes the requirement to comply with anti-bribery laws. Additionally, all contracts include a contractual requirement to comply with anti-bribery laws. All relevant employees undertake annual training and certify their compliance with this Policy;
- **Diversity and Inclusion Policy** which embeds our commitment to ensure that all employees are treated fairly and with dignity and respect at all times and are not discriminated against because of race, colour, nationality, ethnic origin, religion, gender, gender reassignment, sexuality, disability, marital status, trade union membership, age or political affiliation or on the basis of being an ex-offender with a spent sentence. We aim to treat all employees, former employees, clients, suppliers and other members of the public with whom the Company comes into contact, with dignity and respect;
- **Risk Training Programme** is undertaken by all our employees and includes details about modern slavery and human trafficking. The training looks at the issues surrounding modern slavery and human trafficking, the signs to look out for and reminds our employees that they have access to the independent whistleblowing hotline, should they have any concerns;
- **Supplier Registration System** which captures whether products are sourced from high-risk countries. This ensures that the suppliers are correctly identified as a high-risk supplier for modern slavery and human trafficking purposes. High-risk suppliers are monitored to ensure that their working practices are compliant and required to re-certify compliance with our Ethical Trading Policy on an annual basis.

Effectiveness and Performance

We understand that we have a continuing responsibility to assess and mitigate the risk of modern slavery and that these risks are evolving. We are committed to increasing our understanding of these risks and embedding policies and practices to manage the risk.

We have continued to review the effectiveness of our modern slavery framework and the effect of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains.

This statement is made by Center Parcs (Holdings 1) Limited, pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ended 23 April 2021. This is a group statement which covers the subsidiaries that apply to the disclosure criteria of the Act, namely Center Parcs (Operating Company) Limited and CP Woburn (Operating Company) Limited.

This statement was approved by the Center Parcs (Holdings 1) Limited Board of Directors on 27 September 2021

Signed

A handwritten signature in black ink, appearing to be 'M P Dalby', written over a horizontal line.

M P Dalby
Chief Executive Officer